



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

January 19, 2024

Via ECF

Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: *Brennan Center for Justice v. U.S. Dep't of Homeland Security et al.*,  
No. 23 Civ. 5372 (ER)

Dear Judge Ramos:

This Office represents Defendants the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, and the Federal Bureau of Investigation in the above-referenced case brought by Plaintiff Brennan Center for Justice at New York University School of Law ("Brennan Center") pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552.

I write respectfully on behalf of Defendants to request a two-week extension of the parties' current deadline of January 22, 2024, to submit a status update. [ECF No. 34]. The extension is requested because the undersigned attorney has been temporarily reassigned to this matter while the Assistant U.S. Attorneys of record, Rebecca Salk and Samuel Dolinger, are on parental leave. Given the number of FOIA requests at issue in this case and the number of agencies involved, the additional time is needed for the undersigned to familiarize herself with the issues in this matter and the status of the agencies' efforts to respond to the FOIA requests. Plaintiff's counsel consents to this request. This is the Government's first request for an extension of the January 22, 2024 status report deadline.

We thank the Court for its consideration of this request.

The request to extend until February 5, 2024 the deadline for the parties to file a further status update is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: January 22, 2024

New York, New York

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel of record (via ECF)